

Sub-Element 3.e— Implementation of Ingestion Pathway Decisions

<p>What the Policy Says</p>	<p>Intent NUREG-0654 provides that OROs should have the capability to implement protective actions, based on criteria recommended by current Food and Drug Administration guidance, for the ingestion pathway zone (IPZ), the area within an approximate 50-mile radius of the nuclear power plant. This sub-element focuses on those actions required for implementation of protective actions.</p> <p>Minimum Frequency Criteria 3.e.1 and 3.e.2 are to be evaluated once in 6 years.</p> <p>Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions. NUREG-0654, J.9, 11).</p> <p>Extent of Play Applicable OROs should demonstrate the capability to secure and use current information on the locations of dairy farms, meat and poultry producers, fisheries, fruit growers, vegetable growers, grain producers, food processing plants, and water supply intake points to implement protective actions within the ingestion pathway EPZ. OROs should use Federal resources as identified in the FRERP, and other resources (for example, compacts, nuclear insurers, etc.), if available. Evaluation of this criterion will take into consideration the level of Federal and other resources participating in the exercise.</p> <p>All activities must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.</p>
	<p>Criterion 3.e.2: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production. (NUREG-0654, J.9, 11).</p> <p>Extent of Play Development of measures and strategies for implementation of Ingestion Pathway Zone (IPZ) protective actions should be demonstrated by formulation of protective action information for the general public and food producers and processors. This includes either pre-distributed public information material in the IPZ or the capability for the rapid distribution of appropriate pre-printed and/or camera-ready information and instructions to pre-determined individuals and businesses. OROs should demonstrate the</p>

	<p>capability to control, restrict or prevent distribution of contaminated food by commercial sectors. Exercise play should include demonstration of communications and coordination between organizations to implement protective actions. Actual field play of implementation activities may be simulated. For example, communications and coordination with agencies responsible for enforcing food controls within the IPZ should be demonstrated, but actual communications with food producers and processors may be simulated.</p> <p>All activities must be based on the ORO's plans and procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.</p>
Preparing to Evaluate This Criterion	<p>Criterion 3.e.1 Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement:</p> <ul style="list-style-type: none"> • What information is available on the location of water supply intakes, the location of dairy operations, the location of various crops, the location of food processing plants, and the harvest period for crops? • If the information is not in the plan/procedures, from what source is this information to be obtained? • In addition to the location of agribusiness sites, what other information is in the database (e.g., name and address of owner)?
	<p>Criterion 3.e.2 Before the exercise, determine, according to the ORO's plan/procedures and the Extent of Play agreement: (This is under 3.e.1)</p> <ul style="list-style-type: none"> • Are Federal and other resources identified (i.e., the Federal Radiological Emergency Response Plan (FRERP), compacts, etc.) that will assist with determination and implementation of ingestion pathway protective actions? • What are the State/local requirements to implement embargos or condemnations? Who delivers condemnation or embargo notices to agribusiness? • Where or how are condemned food products taken for disposal? • What assistance do Federal resources provide in the implementation of protective measures in the ingestion pathway? • What agencies are to participate in this demonstration and what level of play has been established in the extent of play?

During the Exercise	Criterion 3.e.1 During the exercise, in addition to evaluating activities related to the items listed above, be sure to: <ul style="list-style-type: none">• Document any coordination of implementation of protective actions.• Document any precautionary actions taken to prevent contamination.
	Criterion 3.e.2 During the exercise, in addition to evaluating activities related to the items listed above, be sure to: <ul style="list-style-type: none">• Document measures taken and strategies developed by the ORO to implement protective actions for general public and for food producers in the IPZ, including preventing distribution of potentially contaminated food.• Document arrangements for delivery of all necessary legal notices.• Note coordination and communications among organizations responsible for implementing protective actions (field play may be simulated – see extent of play agreement).• Observe whether reproduction-ready information and instructions to pre-determined individuals and businesses were available for production and distribution (obtain copies of available information). Check to see if the information on the handouts is current.